

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,
MARY DOE and MARY ROE,
on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

File No. 2:22-cv-10209

Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the
State of Michigan, and COL. JOSEPH
GASPER, Director of the Michigan State
Police, in their official capacities,

Mag. Curtis Ivy, Jr.

Defendants.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs, through their attorneys, may introduce the following exhibits at trial.

1. All documents previously produced by the Plaintiffs to the Defendants.
2. All documents being disclosed contemporaneously with this exhibit list, or that will be disclosed on an ongoing basis as those documents are obtained or created.
3. All expert reports previously disclosed to Defendants. This includes all expert witness reports filed on the record, and all expert witness reports disclosed to Defendants on February 28, 2023. Plaintiffs anticipate preparing additional expert reports/rebuttal expert reports based on the class data and in response to Defendants' expert reports.

4. All documents with respect to the individual named plaintiffs. These documents have already been provided to Defendants.
5. All documents from *Does I*, including pleadings, the Joint Statement of Facts, exhibits to the Joint Statement of Facts, deposition transcripts, interrogatories, documents produced by Defendants, responses to requests for admission, and other discovery evidence. These documents have already been provided to or are in the possession of the Defendants.
6. All documents from *Does II*, including pleadings, declarations, notices, and documents produced by the Defendants. These documents have already been provided to or are in the possession of Defendants.
7. All documents already filed in *Does III*. These documents are in Defendants' possession.
8. Responses to formal and informal discovery requests and documents produced in response to formal and informal discovery requests in this case, including all documents and responses produced by Defendants.
9. All documents produced by the Michigan Department of Corrections. The MDOC has been providing these documents and data to Defendants when producing them to Plaintiffs.
10. All documents produced in response to any subpoena issued by Defendants.
11. Transcripts from any depositions taken in this case, or in *Does I*, and any documents used as an exhibit during such depositions.
12. Any relevant policies and procedures of the Michigan State Police related to the Sex Offender Registry, and any relevant information available on Michigan's Public Sex Offender Registry.
13. All documents identified by Defendants.
14. All documents needed to lay a foundation.
15. All documents needed for rebuttal or impeachment.

16. All documents or electronically stored information that may be ascertained through continuing discovery or investigation.

Plaintiffs reserve the right to amend and supplement this list as discovery is completed, up to and including the day of trial.

This exhibit list is intended to supplement Plaintiffs' initial disclosures under Rule 26.

Respectfully submitted,

s/ Miriam J. Aukerman (P63165)
Dayja S. Tillman (P86526)
American Civil Liberties Union
Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
(616) 301-0930
maukerman@aclumich.org

s/ Paul D. Reingold (P27594)
Cooperating Counsel, American Civil
Liberties Union Fund of Michigan
Univ. of Michigan Law School
802 Legal Research Building
801 Monroe Street
Ann Arbor, MI 48109-1215
(734) 355-0319 - pdr@umich.edu

s/ Daniel S. Korobkin (P72842)
Syeda Davidson (P72801)
American Civil Liberties Union
Fund of Michigan
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6824
dkorobkin@aclumich.org

s/ Roshna Bala Keen (Ill. 6284469)
Lauren Carbajal (Cal. 336485).
Loevy & Loevy
Cooperating Counsel, American Civil
Liberties Union Fund of Michigan
311 North Aberdeen, 3rd Floor
Chicago, Illinois 60607
(312) 243-5900
roshna@loevy.com

Dated: March 21, 2023